

AFFIDAVIT OF SPECIAL AGENT RANDY R. REEVES

I, Randy R. Reeves, having been duly sworn, do hereby depose and state as follows:

1. I am a Special Agent with the United States Immigration and Customs Enforcement ("ICE"), formerly the United States Immigration and Naturalization Service ("INS"), and have been so employed since January 1987. Among other duties, I am assigned to investigate the manufacture and sale of fraudulent Immigration and Naturalization Resident Alien cards, Form I-551 (hereinafter "green cards"). From my training, I know that persons, usually aliens, manufacture and distribute counterfeit resident alien cards, social security account number cards (hereinafter "SSANC") and other false documentation. The counterfeit documents are then sold to aliens who are illegally in the United States or who do not have permission to work in the United States.

2. I am familiar with Title 18, United States Code, Sections 1028(a)(2) and 2, which make it unlawful, among other things, to knowingly transfer an identification document or a false identification document knowing that the document was either stolen or produced without lawful authority, or to aid and abet someone in the commission of the offense. Having so stated, I submit this affidavit in support of a complaint charging two individuals with violation of 18 U.S.C. §§1028(a)(2) and 2. The first is a

man named Moises whose last name is unknown ("Moises LNU") and the second is a man named Jose Carlos Junior ("Carlos"). The affidavit is based on my personal knowledge, information provided to me by other law enforcement officers and ICE agents, as well as information provided to me by a Confidential Source (CS1).

Background

3. On three separate dates during September and October of 2004, CS1 placed a consensually monitored and recorded telephone call to Moises LNU at 617-908-5149 in an attempt to arrange the purchase of fraudulent green cards and social security cards from Moises LNU. Although the telephone number CS1 had for Moises LNU traces back to the Adams national park in Quincy, Massachusetts, Moises LNU answered the call each time.

4. On September 22, 2004, Moises LNU indicated that he could provide CS1 with the above described documents and he further related that he operates a real estate business in Malden, MA. Moises LNU stated that he would call CS1 later with a price for the documents.

5. On October 06, 2004, at approximately 4:30 p.m., Moises LNU told CS1 that he recently fixed the computer that is used to manufacture the documents. Moises LNU stated that he is not the person who makes the documents and that he would call CS1 back with the name and telephone number of the manufacturer. Moises LNU further stated that the

documents would cost either \$100.00 or \$120.00 per set.

6. On October 19, 2004, at approximately 4:30 p.m., Moises LNU told CS1 that he could provide the fraudulent green cards and social security cards for \$120.00 per set.

7. On November 3, 2004, I learned from another confidential source, CS2, that Moises LNU is currently driving a silver, Dodge Intrepid bearing Massachusetts license 11PC59, and resides at 241 Lexington Street, unit #B4, in Woburn, Massachusetts. Registry of Motor Vehicles records show that the vehicle is registered to an individual named Fabio Mendes, d/o/b 1972, of 39 Avon Street, #2, in Malden, Massachusetts. Based on my investigation, I do not believe that Moises LNU and Fabio Mendes are the same person.

8. On November 15, 2004, at approximately 2:15 p.m., CS1 called Moises LNU in an attempt to arrange the purchase of two sets of fraudulent green cards and social security cards. During the monitored call, Moises LNU related that he could provide the documents requested and he and CS1 arranged to meet at the Burlington Mall in Burlington, Massachusetts on November 16, 2004 at 3:00 p.m.

The First Purchase

9. On November 16, 2004, at approximately 2:30 p.m., ICE agents met with CS1 at the Burlington Mall. They gave CS1 two green card style photographs containing the names Felipe RODRIGO, dob/ 03-16-1978, and Joel SANTANA, dob/ 06-25-1969. The agents also searched CS1 and the vehicle CS1

was to use to confirm the absence of any contraband, and fitted CS1 with audio recording and transmitting devices. Moises LNU arrived at approximately 3:30 p.m., driving the Dodge Intrepid bearing Massachusetts registration 11PC59. He and CS1 met in the parking lot for about 30 minutes. During the meeting, Moises LNU admitted to being the manufacturer of the documents, and stated that the documents would be ready for pickup the following day at approximately 3:00 p.m. CS1 subsequently arranged to meet with Moises LNU again on November 18, 2004.

10. On November 18, 2004 at approximately 3:00 p.m., ICE agents met with CS1 at the Burlington Mall. After searching CS1 to ensure CS1 had no money or contraband, the agents provided CS1 with \$200.00 in U.S. currency and fitted CS1 with audio and video recording devices. Moises LNU arrived at approximately 3:30 in the Dodge Intrepid, accompanied by a woman whom Moises LNU identified as his wife. During their meeting, CS1 gave Moises LNU the \$200.00 and Moises LNU in turn gave CS1 two sets of fraudulent green cards and social security cards with numbers for the two people referenced in Paragraph 9. Moises LNU and the woman left after about 10 minutes and traveled to 241 Lexington Street in Woburn.

The Second Purchase

11. The second purchase occurred on December 28, 2004. Previously, on December 21, 2004, Moises LNU and CS1

had met at the Burlington Mall parking lot in a monitored meeting and CS1 had given Moises LNU a green card style photograph bearing the name LOPES, Claudia Cardozo, dob/ 12-05-1970. On December 28, 2004, Moises LNU called CS1 to report that he had completed the documents and the two agreed to meet at the Burlington Mall at 4:30 p.m. the same day. As with the first transaction, ICE agents met with CS1 prior to the meeting and fitted CS1 with a digital recording device and audio transmitter, and, after ensuring CS1 had no contraband or money, gave CS1 \$120.00 to complete the deal. After Moises LNU arrived, again in the Dodge Intrepid, CS1 got into his car. CS1 gave Moises LNU \$120.00 and Moises LNU gave CS1 a fraudulent green card in the name of Claudia Cardozo Lopes, and one fraudulent social security card bearing the number 028-54-7810.

The Third Purchase

12. The third transaction took place on February 3, 2005 and involved both Moises LNU and Carlos. Following a telephone conversation the previous day, Moises LNU and CS1 met at the Burlington Mall at about 7:40 a.m. to discuss the sale to CS1 of four fraudulent sets of green cards and social security cards. Prior to the meeting, ICE agents provided CS1 with four green card style photographs bearing the names Fatima SANTANA, dob/ 08-15-78, Manuel COUTO, dob/ 12-17-72, Lydia WILLIAMS, dob/ 05-25-76, and Kleber DOS SANTOS REIS, dob/ 04-11-72. CS1 also was fitted with a

digital recording device. During their meeting, which took place in Moises LNU's Dodge Intrepid, CS1 gave the photographs to Moises LNU. Moises LNU stated that he was no longer making the documents and that a friend of his would be making and delivering them later that afternoon. Moises LNU stated that this person would call CS1 at approximately 4:00 p.m. to arrange for delivery of the documents to the Café Belo Restaurant in Everett, MA. Following this meeting, Moises LNU was surveilled as he left and drove to his residence at 241 Lexington Street in Woburn.

13. At approximately 10:40 a.m., a brown Honda Civic bearing Massachusetts's registration RT7260 was observed parking at 241 Lexington Street. The driver of the vehicle went into the building at 241 Lexington Street and came out approximately two minutes later and drove towards Interstate 93. RMV records show that the vehicle is registered to Carlos Junior, i.e., Jose Carlos Junior, of 371 Boston Street, unit #26, in Lynn, MA. Moises LNU subsequently left the residence shortly thereafter and drove to "Brother's Pizza" located at 186 Lexington Street in Woburn, MA. Surveillance established that he was working there.

14. At approximately 3:30 p.m., CS1 received a telephone call from a man identifying himself as "Junior," who my investigation has revealed is Carlos. Carlos related that the documents were ready to be picked up in 45 minutes. At the direction of ICE agents, CS1 changed the meeting

location to the Café Belo in Somerville. Agents then met with CS1 and, as before, confirmed CS1 possessed no money or contraband, fitted CS1 with a recording device, and gave CS1 \$400.00 to complete the transaction. CS1 then drove to the Café Belo. When Carlos arrived at about 4:30 p.m. in the brown Honda Civic, he got into CS1's vehicle and handed CS1 completed green cards and social security cards for the four individuals referenced in Paragraph 12; CS1 gave him \$400.00 in turn. Following the transaction, Carlos drove to and entered the residence at 326 Main Street in Everett, MA.

The Fourth Purchase

15. The fourth purchase took place on February 8, 2005. At approximately 3:00 p.m. on that day, ICE agents provided CS1 with three green card style photographs bearing the names Roberto GONSALVES, dob/ 01-21-72, Maria GOMES, dob/ 07-11-79, and Maria LOPES, dob/ 10-25-69. Carlos subsequently called CS1 and they agreed to meet at the Café Belo in ten minutes. CS1 arrived at the Café at about 3:20 p.m. Carlos arrived shortly thereafter in the brown Honda Civic and entered CS1's vehicle. CS1 gave Carlos the photographs and Carlos stated that the documents would be ready at approximately 5:00 p.m.

16. Prior to the meeting, ICE agents again searched CS1 with negative results, fitted CS1 with a recording device, and gave CS1 \$300.00 to complete the transaction. Carlos arrived at 5:20 p.m. in the brown Honda Civic. He

walked over to CS1's car and handed CS1 a yellow envelope containing completed green cards and social security cards for the three people referenced in Paragraph 15. CS1 in turn gave Carlos \$300.00.

The Fifth Purchase

17. The fifth purchase took place on February 16, 2005. On that day, ICE agents provided CS1 with three green card style photographs bearing the names Eugenia RAMOS, dob/ 02-19-51, Antonio J. SOUSA, dob/ 11-22-69, and Sebastiao DE JESUS, dob/ 07-15-52. CS1 then called Carlos at about 11:15 a.m. and arranged to meet him in 10 minutes at the Café Belo in Somerville. When Carlos arrived in the brown Honda Civic he got into CS1's vehicle. During their monitored meeting, CS1 gave Carlos the photographs and Carlos stated the documents would be ready in 30-40 minutes. After a surveillance unit followed Carlos back to the vicinity of Bucknam and Park Streets in Everett, ICE searched CS1 with negative results and gave CS1 \$300.00 to complete the transaction.

18. Carlos called CS1 shortly before noon and stated that he would meet CS1 at the Bank of America parking lot near another Café Belo restaurant located in Everett. CS1 arrived at approximately 12:05 p.m. but Carlos did not show initially. At about 12:50 p.m., Carlos called CS1 and instructed CS1 to drive to a location on School Street in Everett, MA. Carlos met CS1 there and the two then traveled

in CS1's vehicle to Carlos's vehicle, which was parked at 169 Bucknam Street in Everett. During the drive, Carlos gave CS1 the completed documents for the three individuals referenced in Paragraph 17 and CS1 gave him \$300.00 in return. Following the transaction, Carlos entered the residence at 169 Bucknam Street.

The Sixth Purchase

19. On March 22, 2005, at approximately 10:50 a.m., CS1 and Carlos agreed during a monitored telephone conversation to meet at 3:00 p.m. in the Bank of America parking lot located in Everett, which Carlos referred to as the Fleet bank. CS1 attended the meeting after being provided with two green card style photographs bearing the names Vera SANTANA, dob/ 03-17-71, and Belmiro SANTOS, dob/ 08-23-55. Agents also provided CS1 with \$200.00. Carlos arrived at about 3:30 p.m. in a blue Nissan Altima bearing Massachusetts registration 94PP22. During a brief meeting in the Altima, CS1 gave Carlos the photographs and Carlos stated the documents would be ready in 15 minutes.

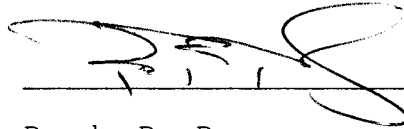
20. Carlos returned to the residence at 326 Main Street. He called CS1 from there at about 4:30 p.m. to report that he was having problems and that it would take another 40-50 minutes to complete the documents. At approximately 6:10 p.m., Carlos left the residence with an unidentified female and they drove from 326 Main Street to the Fleet bank parking lot. When CS1 arrived about five

minutes later, Carlos got out of the Altima and got into CS1's vehicle. Carlos gave CS1 two sets of fraudulent green cards and social security cards for the two people listed in Paragraph 19 and CS1 in turn gave Carlos \$200.00.

21. In sum, I have received a total of fifteen (15) sets of documents as a result of the six transactions summarized above. I have reviewed all the documents and have determined that they are counterfeit identification documents. A review of ICE and Social Security Administration documents reveals that the green card and SSANC numbers that Moises LNU and/or Carlos used are either invalid, or belong to an individual other than the person listed on the documents.

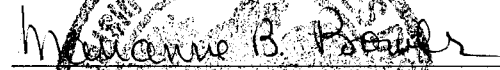
Conclusion

22. Based on the foregoing, I believe probable cause exists to conclude that Jose Carlos JUNIOR and Moises LNU did knowingly and without lawful authority, transfer false identification documents, in violation of Title 18 U.S.C. Sections 1028(a)(2) and 2.



Randy R. Reeves
Special Agent
Immigration & Customs
Enforcement

Subscribed and sworn to before me this 13 day of May,
2005. @ 2:30 PM.



MARIANNE B. BOWLER
United States Magistrate Judge

